1 Weltman - Direct Α Yes. Now that I recall, it was called 2 3 ROSSBURS. 4 MR. ZUCKERBERG: Can we clarify for 5 the record whether or not we're talking about Ross using this software or DMI? 6 7 MR. MASTAGLIO: Let me get the names 8 and I will, thank you. 9 MR. ZUCKERBERG: Thank you. 10 The software that was being used by 11 the admissions department for various purposes, did 12 that have a name? I don't recall what its name was. Yes, 13 14 it did have a name. 15 Do you remember a software package 16 being used by admissions called PROSPECTS? 17 That goes back to, the best I can recollect, approximately 2002. The use of it was 18 discontinued sometime around then. 19 20 (Whereupon, Mr. Sclafani entered the 21 conference room.) 22 MR. SCLAFANI: For the purposes of 23 this deposition I'm representing Mr. Simon. 24 The full extent of my representation has yet 25 been determined because I was only recently

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apprised of the action and only about half an hour ago advised that there would be depositions in this case. We reserve our right to re-depose, not having had notice or understanding of these depositions.

It appears that there's a conflict between Neal Simon and AUA, the Defendant, hence my representation. We weren't notified about these depositions until this morning. I'll do the best I can, but I reserve our rights to re-depose.

Q Mr. Weltman, what is your understanding of the relationship, if any, between DMI and Ross University School of Medicine?

A DMI is the administrator, to my understanding, of all the business affairs of Ross University in the United States.

Q Was it your understanding that these computer programs that you referred to, PROSPECTS system, you mentioned ROSSBURS which has to do with the bursar's office, that these were being used by DMI?

A Yes.

Q Were all the employees that you worked

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